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8 *Attorneys for Defendant, Conn Appliances, Inc.*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 JESUS GONZALEZ,

9 Plaintiff,

10 vs.

11 CLARITY SERVICES, INC.; EQUIFAX
12 INFORMATION SERVICES, LLC;
13 EXPERIAN INFORMATION SOLUTIONS,
14 INC.; NATIONAL CONSUMER TELECOM
15 & UTILITIES EXCHANGE; TRANS UNION,
16 LLC dba CASH FACTORY USA; CONN
17 APPLIANCES, INC.; GREAT AMERICAN
18 FINANCE HOLDINGS, LLC; AT&T
19 MOBILITY, LLC; and COX
20 COMMUNICATIONS LAS VEGAS, INC.,

21 Defendants.

Case No.: 2:21-CV-01068-APG-BNW

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (FIRST
REQUEST)**

22 Defendant, Conn Appliances, Inc. ("Conn") by and through its counsel of record, hereby
23 moves this Court as follows:

24 On June 7, 2021, Plaintiff filed his Complaint [ECF No. 1]. Conn was served with
25 Plaintiff's Complaint on July 16, 2021. The deadline for Conn to respond to Plaintiff's Complaint
26 is August 6, 2021. Plaintiff and Conn have discussed extending the deadline for Conn to respond
27 to Plaintiff's Complaint to allow for better investigation of the allegations and discuss possible
28 resolution of the matter. Conn sent Plaintiff a draft of a proposed joint motion on August 6, 2021,
but has not yet received a response as of the time of this filing.

WHEREAS, Conn moves to extend the deadline for Conn to file its responsive pleading to

1 Plaintiff's Complaint to September 7, 2021.

2 This is the first motion for an extension of time for Conn to file their responsive pleading.
3 The extension is requested in good faith and is not for purposes of delay or prejudice to any other
4 party.

5 As part of this motion, Conn agrees to participate in any Rule 26(f) conference that occurs
6 during the pendency of this extension.

7 DATED this 6th day of August, 2021.

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9 WRIGHT, FINLAY & ZAK, LLP

10 /s/ Ramir M. Hernandez

11 Ramir M. Hernandez, Esq.

12 Nevada Bar No. 13146

13 7785 W. Sahara Ave., Suite 200

14 Las Vegas, NV 89117

15 *Attorneys for Defendant, Conn Appliances,*
16 *Inc.*

17 IT IS SO ORDERED:

18 

19 UNITED STATES MAGISTRATE JUDGE

20
21 DATED: 08-09-2021